

ROBERT DAVID GOODSTEIN  
ATTORNEY AT LAW  
56 HARRISON STREET  
SUITE 401  
NEW ROCHELLE, NEW YORK 10801  
PHONE: (914) 632-8382  
FAX: (914) 632-1833

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: _____

ROBERT DAVID GOODSTEIN  
PAULA JOHNSON KELLY  
EILEEN WEST  
OF COUNSEL

**MEMO ENDORSED**

April 15, 2008

Hon. Kenneth M. Karas, U.S.D.J.  
United States District Court, Southern District of New York  
300 Quarropas Street, Chambers 533  
White Plains, New York 10801-4150

Re: Sydnor v. Avet Coach Corp. and Harvey Goldberg  
Docket No: 08 Civ. 2417 (KMK)

Dear Judge Karas:

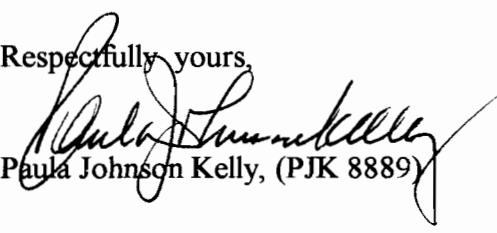
This firm represents plaintiff in the above referenced action.

Counsel respectfully writes to inform the Court that this Firm seeks to withdraw as plaintiff's counsel. On behalf of plaintiff, we timely commenced this action to reserve her rights under Title VII. However, this Firm now makes this request to withdraw based upon our irreconcilable differences with our client, who has failed to communicate or cooperate with our Firm, which has made it difficult to protect plaintiff's interests. We have previously notified our client in writing of our intent to move to withdraw, however, she has failed to respond.

No party will be prejudiced by the grant of this request as this action was just recently commenced and defendants have not yet answered. In fact, defendant Avet filed for bankruptcy and the matter must be stayed as to that defendant. Defendant Goldberg has yet to retain counsel and has requested a thirty-day extension, until May 14, 2008, in which to answer or move on the complaint.

Accordingly, we request that: (1) this Firm be allowed to withdraw as counsel for plaintiff, (2) as to defendant Goldberg - this matter be stayed pending a determination of this request, and plaintiff be afforded a reasonable time to retain replacement counsel; and (3) as to defendant Avet - this matter be stayed, pursuant to Section 362(a)(1) of the Bankruptcy Code, until that filing be resolved.

Respectfully yours,

  
Paula Johnson Kelly, (PJK 8889)

cc: Shannen Sydnor

Kim R. Lynch, Esq. (*Attorney for defendant Avet*)  
FORMAN HOLT ELIADES & RAVIN, LLC.  
80 Route 4 East, Suite 290  
Paramus, New Jersey 07652  
(201) 845-1000  
[klynch@formanlaw.com](mailto:klynch@formanlaw.com)

Richard L. Steer, Esq. (*Attorney for defendant Goldberg*)  
TARTER KRINSKY & DROGAN, LLP  
1350 Broadway  
New York, New York 10018  
(212) 216-8000  
[Mail@Tarterkrinsky.com](mailto:Mail@Tarterkrinsky.com)

Plaintiff's Counsel are directed to serve  
a copy of this letter on Plaintiff by April 30, 2008.  
(Plaintiff will be given until May 21, 2008 to  
respond. The Court will hold a conference ~~to~~ on  
(11:00 AM)  
~~on~~ June 3, 2008 to address counsel's request  
to withdraw and the other requests made herein.  
All counsel are to attend this conference, as is  
Plaintiff.

SO ORDERED  
KENNETH M. KARAS U.S.D.J.  
4/21/08